

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

William S. Keller
a/k/a Scott Keller
d/b/a Scott's Towing

Debtor(s)

Manchester Township,

Plaintiff(s)/Movant(s)

vs.

William S. Keller

Defendant(s)/Respondent(s)

CHAPTER 7

CASE NO. 1 - 17 .bk- 03059-RNO

ADVERSARY NO. - ap-
(if applicable)

Nature of Proceeding: Motion to Convert

Case to Chapter 7

Document #: 79, 85

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

The parties are attempting to resolve this matter by Stipulation, but are in need of additional time to do so. The parties request that the hearing on this matter be continued for 60 days.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 09/23/2019

/s/Lawrence V. Young, Esquire

Attorney for Manchester Township

Name: Lawrence V. Young, Esquire

Phone Number: 717-718-7110

¹ No alterations or interlineations of this document are permitted.